

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Norfolk Division

CSX Transportation, Inc.

Plaintiff

v.

Norfolk Southern Railway Company, *et al.*

Defendants

C.A. No. 2:18-cv-00530-MSD-LDL

**VIRGINIA INTERNATIONAL TERMINALS, LLC'S
MOTION TO QUASH**

Pursuant to Federal Rules of Civil Procedure 26 and 45, Virginia International Terminals, LLC (“VIT”), a non-party to the above-captioned litigation, moves to quash or otherwise modify the subpoena to testify at deposition issued in this matter by Norfolk Southern Railway Company (“Defendant” or “Norfolk Southern”) to the Virginia Port Authority (the “VPA”). Specifically, the subpoena should be quashed because compliance would require the disclosure of privileged, confidential, and proprietary commercial information of VIT. In support of its Motion, VIT files the accompanying Memorandum in Support.

Dated: March 20, 2020

VIRGINIA INTERNATIONAL TERMINALS, LLC

By: /s/ Edward J. Powers
Of Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on Friday, March 20, 2020, a true and accurate copy of the foregoing was filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record:

/s/ Edward J. Powers